

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TORREY GRAGG, on his own behalf and on
behalf of similarly situated persons,

Plaintiff,

v.

ORANGE CAB COMPANY, INC., a
Washington corporation; and RIDECHARGE,
INC., a Delaware corporation d/b/a TAXI
MAGIC,

Defendants.

No. C12-0576RSL

STIPULATION AND
~~PROPOSED~~ ORDER
REGARDING MOTION FOR
FINAL APPROVAL OF CLASS
ACTION SETTLEMENT

I. STIPULATION

The parties, by and through their attorneys of record, respectfully request that the Court (1) extend by one week the filing deadline for Plaintiff's Motion for Final Approval of Class Action Settlement, and (2) clarify the date of the final approval hearing. In support of this request, the parties stipulate and agree as follows:

1. The Court's March 28, 2017, Amended Order Granting Preliminary Approval of Class Action Settlement (Dkt. #205) states that Representative Plaintiff "shall file with the Court his motion for final approval of the Settlement and any responses to objections to the Agreement or the Fee and Cost Application, together with all supporting documentation, within twenty-one (21) days after the deadline for serving objections." *Id.* ¶ 14(d). Under the notice approved by the Court and mailed by the claims administrator in this matter, the deadline for objections was

May 30, 2017, which makes June 20, 2017, the current deadline for Plaintiff's Motion for Final Approval. However, preparation of the motion has been delayed because an attorney working on the motion left on maternity leave sooner than expected. Consequently, Counsel respectfully requests a one-week extension of the filing deadline for plaintiff's final approval motion. A one-week extension of the filing deadline will not affect the date of the final approval hearing or any other upcoming event in the case.

2. The parties also wish to clarify whether the final approval hearing will occur on October 5, 2017, or December 7, 2017. The Amended Order Granting Preliminary Approval of Class Action Settlement (Dkt. # 205) states that the hearing is scheduled to occur at 9:00 a.m. on December 7, 2017. *See id.* at p. 4:2. However, elsewhere in that Order, it states that the hearing is scheduled to occur at 9:00 a.m. on October 5, 2017. *See id.* at p. 8:4.

3. The parties therefore seek clarification on whether the hearing will be on October 5 or December 7. For purposes of considering the matter, the parties note for the Court that the notice sent to class members stated that the hearing would occur on December 7, 2017. However, counsel did not receive any objections to the settlement by the objection deadline and counsel has no reason to believe that any class members plan to lodge untimely objections at the final approval hearing.

Respectfully submitted this 20th day of June, 2017, by:

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10 **II. ORDER**

11 Having considered the foregoing Stipulation and for good cause shown it is hereby
12 ORDERED that the deadline for Plaintiff's Motion for Final Approval is June 27, 2017. The
13 final approval hearing in this matter will proceed on the following date: Oct. 5, 2017 @ 9am

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15 Honorable Robert S. Lasnik
16 United States District Judge